

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NEPAMUCENO GALVAN,

Plaintiff,

v.

23-cv-06724 (CS)

ROLLING LAWNS, INC., DAVID FERRARO and
EVAN FERRARO,

Defendant.

PLEASE TAKE NOTICE, that upon the Defendants' Memorandum of Law dated February 20, 2025, and the exhibits attached thereto, Defendants move this Court for an order dismissing counts 4-8 of the Complaint (asserting claims of discrimination under the New York State Human Rights Law) for lack of subject matter jurisdiction pursuant to FRCP 12(b)(1).

Pursuant to the Court's Order of February 4, 2025, Plaintiff's opposition to this motion is due by March 18, 2025 and Defendants' reply is due by April 1, 2025.

Dated: February 20, 2025
Huntington, New York

Respectfully submitted,
Moser Law Firm, P.C.

Steven John Moser

By: Steven John Moser (SM1133)
133 C New York Avenue
PO Box 710
Huntington, NY 11743
(516) 671-1150
smoser@moseremploymentlaw.com

Attorneys for Defendants